The Honorable David W. Christel

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UNITED STATES DISTRICT COURT

## WESTERN DISTRICT OF WASHINGTON AT SEATTLE

DONALD E. MORISKY, an individual,

Plaintiff,

v.

MMAS RESEARCH, LLC, a Washington limited liability company, et al.,

Defendants.

Case No. 2:21-CV-01301-RSM-DWC

STIPULATION AND ORDER TO EXTEND TIME TO TAKE DEPOSITIONS OF STEVEN TRUBOWAND THE RULE 30(B)(6) DESIGNEE(S) OF THE MMAS RESEARCH DEFENDANTS

## **STIPULATION**

The Plaintiff/Counterclaim Defendant Parties. Donald E. Morisky and Defendant/Counterclaimants Steve Trubow ("Trubow") and the MMAS Research Defendants (MMAS Research, LLC; MMAS RESEARCH ITALY S.R.L., and MMAS RESEARCH FRANCE, SAS") (collectively, "Defendants"), through their undersigned counsel of record, stipulate to the entry of an order extending the time for Plaintiff to take the depositions of Trubow and the Rule 30(b)(6) designee(s) of the MMAS Research Defendants (the "Depositions") from the current deposition discovery deadline of January 13, 2023, to February 28, 2023. The Depositions were originally scheduled for January 6, 2023; however, Defendants and their counsel subsequently identified conflicts with this date arising from pending federal cases involving the parties in other jurisdictions. To accommodate these conflicts, the Parties hereby stipulate to extend the time to take these Depositions to February 28, 2023.

STIPULATION AND ORDER EXTENDING DEADLINE TO TAKE DEPOSITIONS OF TRUBOW AND MMAS RESEARCH CASE No. 2:21-cv-01301-RSM-DWC

WEIDE & MILLER, LTD. 10655 Park Run Drive, Suite 100 Las Vegas, NV 89144 Tel. (702) 382-4804

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Neither party will be prejudiced by this proposed stipulation extending the time to take these 1 Depositions, and the undersigned counsel for the Parties affirms this stipulation is made in good faith 2 and not for purposes of harassment or undue delay in this matter. 3 SO STIPULATED this 10th day of January 2023. 4 5 s/Brett C. Harris s/ F. Christopher Austin Brett C. Harris F. Christopher Austin (*Pro Hac Vice*) 6 VIRGO LAW LLC WEIDE & MILLER, LTD. 119 1st Ave. S., Ste. 310 10655 Park Run Drive, Suite 100 7 Seattle, WA 989104 Las Vegas, NV 89144 8 Paul S. Haberman (Pro Hac Vice Pending) William J. Crowley 9 LAW OFFICES OF PAUL S. HABERMANN LLC CROWLEY LAW OFFICES, P.S. 19 Engle Street, 600 University Street, Suite 1901 10 Tenafly, NJ 07670 Seattle, WA 98101 11 Attorneys for Defendant/Counterclaimants Attorneys for Plaintiff/Counterclaim Defendants 12 13 14 **ORDER** 15 This matter having come before the Court on the stipulation of the parties, and good cause 16 having been shown, 17 IT IS HEREBY ORDERED THAT the discovery deadline to take the depositions of Steven 18 Trubow and the Rule 30(b)(6) designee(s) of the MMAS Research Defendants is hereby extended 19 to February 28, 2023. 20 DATED this 10th day of January 2023. 21 22 23 David W. Christel 24 United States Magistrate Judge 25 26 27

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